

Justin O. Burton (6506)  
Scott T. Blotter (6185)  
**RULON T. BURTON & ASSOCIATES**  
Attorney for Debtor  
448 E. Winchester St., Suite 175  
Murray, Utah 84107  
(801) 288-0202

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**IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH**

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In re:	Case No. 25-20424
Christopher James Ivester,	Ch 13
Debtor.	Conf. Hrg.: April 15, 2025 at 2:00 p.m.
	Hon. Kevin R. Anderson

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**OBJECTION TO TRUSTEE’S MOTIONS TO DISMISS (DKT NOS. 13, 19, & 20);  
MOTION TO RESCHEDULE MEETING OF CREDITORS, CONFIRMATION  
HEARING AND EXTEND APPLICABLE DEADLINES**

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Chistopher James Ivester (“Debtor”), by and through counsel, Rulon T. Burton & Associates, PC, hereby objects to the Trustee’s Motions to Dismiss (Dkt. Nos. 13, 19, & 20).

In support thereof, Debtor states the following:

Objection to Motion to Dismiss Dkt. No. 13

Docket No. 13 is the Trustee’s Motion to Dismiss for failure to provide the Trustee with a profit and loss statement and a business questionnaire. Debtor will continue to work diligently with Counsel to provide the required documents.

Objection to Motion to Dismiss Dkt. No. 19

Docket No. 19 is the Trustee’s Motion to Dismiss for failure to tender the initial plan payment. Debtor will tender the initial plan payment prior to the hearing set for confirmation.

Objection to Motion to Dismiss Dkt. No. 20

Docket No. 20 is the Trustee’s Motion to Dismiss alleging unreasonable delay and denial of confirmation as the reasons for dismissal. The Trustee is not recommending confirmation due to Debtor’s failure to: provide property tax assessment, 2024 tax returns (complete both personal and business), bank statements (business case December - February all accounts). Debtor will continue to work diligently with Counsel to gather the required documents and provide the documents to the Trustee.

Motion to Reschedule Meeting of Creditors and to Extend Applicable Deadlines

Due to the Debtor's failure to timely provide the business questionnaire and profit and loss statements, the Trustee did not conduct the Debtor's Meeting of Creditors. Therefore, Debtor requests that the Court reschedule the Meeting of Creditors. The confirmation hearing will also need to be rescheduled. Additionally, Debtor requests that the Court extend the deadline to object to claimed exemptions to date 30 days after the rescheduled Meeting of Creditors and extend the deadline to object to discharge to a date 60 days after the rescheduled Meeting of Creditors.

WHEREFORE, Debtor respectfully requests that the Court:

1. Deny the Trustee's Motion to Dismiss Docket No. 13;
2. Deny the Trustee's Motion to Dismiss Docket No. 19;
3. Deny the Trustee's Motion to Dismiss Docket No. 20;
4. Reschedule the Meeting of Creditors;
5. Reschedule the hearing on confirmation of the Debtor's plan;
6. Extend the deadline to object to claimed exemptions to a date 30 days after the re-scheduled Meeting of Creditors;
7. Extend the deadline to object to discharge to a date 60 days after the re-scheduled Meeting of Creditors.

Dated: March 17, 2025

\_\_\_\_\_/s/\_\_\_\_\_  
Justin O. Burton  
*Attorney for Debtor*  
**Rulon T. Burton and Associates**

**MAILING CERTIFICATE**

Under penalty of perjury, I hereby certify that on March 17, 2025, I caused to be delivered electronically via ECF and/or mailed postage prepaid a true and correct copy of the **OBJECTION TO TRUSTEE'S MOTIONS TO DISMISS (DKT NOS. 13, 19, & 20); MOTION TO RESCHEDULE MEETING OF CREDITORS, CONFIRMATION HEARING AND EXTEND APPLICABLE DEADLINES** to the following: Rulon T. Burton & Associates via ECF; Lon A. Jenkins, Chapter 13 Trustee, via ECF;

\_\_\_\_\_/s/\_\_\_\_\_  
Mailing Clerk